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*Attorneys for Plaintiff  
Lottotron, Inc.*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
NEWARK DIVISION**

<b>LOTTOTRON, INC.,</b>	)	
<b>a New Jersey Corporation,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	<b>CIVIL ACTION NO.</b>
<b>v.</b>	)	
	)	<b>JURY TRIAL DEMANDED</b>
<b>EH NEW VENTURES INC.,</b>	)	
<b>a British West Indies Corporation,</b>	)	<b>ELECTRONICALLY FILED</b>
	)	
<b>Defendant.</b>	)	

**COMPLAINT**

Now comes the plaintiff, Lottotron, Inc. ("Lottotron"), and alleges by way of complaint against EH New Ventures, Inc. ("EH") as follows:

**PARTIES**

1. Lottotron is a New Jersey corporation, having a principal place of business located at 207 Lodi Street, Hackensack, New Jersey 07601-3916.

2. Upon information and belief, EH is a company organized under the laws of the British West Indies, having a principal place of business at P.O. Box W1143, Airport Road, St. John's, Antigua, British West Indies.

### **JURISDICTION AND VENUE**

3. This Court has subject matter jurisdiction under 28 U.S.C. § 1338(a).

4. EH operates the VIP Slots website. Through that interactive website, EH offers a multiple-game, on-line wagering format in this Judicial District and elsewhere.

5. Venue is proper in this Judicial District pursuant to 28 U.S.C. § 1400.

### **COUNT I – PATENT INFRINGEMENT**

6. Lottotron hereby incorporates by reference the allegations contained in paragraphs 1-5, above.

7. Lottotron is the owner by assignment of U.S. Patent No. 5,921,865, entitled *Computerized Lottery Wagering System* (“the ‘865 patent”). A copy of the ‘865 patent is attached hereto as Exhibit A.

8. EH’s operation of the VIP Slots interactive gaming website directly infringes the claims of the patent in suit in violation of 35 U.S.C. § 271(a).

9. EH has also induced and contributed to the infringement of the claims of the ‘865 patent by others.

10. EH’s infringement has caused irreparable injury to Lottotron.

### **PRAYERS FOR RELIEF**

WHEREFORE, Lottotron respectfully requests the following relief:

1. That EH be found by this Court to infringe the '865 patent;
2. That EH, its agents, officers, sales representatives, servants, employees, representatives, associates, attorneys, successors and assigns, and any and all persons or entities acting by, through, under, or in concert, privity or in participation with, any or all of them, be permanently enjoined by Order of this Court from doing, abiding, causing, aiding or abetting any of the following:
  - (a) directly or indirectly infringing, or inducing or causing any person or entity to infringe the '865 patent; or
  - (b) contributing to the infringement of the patent in suit; or
  - (c) from assisting, aiding or abetting any other person or entity from engaging in or performing any of the above-described acts.
3. That the Court issue an order directing EH to provide proof that they have ceased infringing the '865 patent;
4. That the Court award Lottotron its damages in accordance with 35 U.S.C. § 284;
5. That the Court award Lottotron its costs, including attorneys' fees, and an assessment of interest;
6. That EH be directed to pay over to Lottotron all damages suffered by Lottotron as a result of EH's acts herein complained of; and
7. That the Court grant such other and further relief as it deems just and proper.

**JURY DEMANDED**

Lottotron hereby demands a trial by jury on all issues so triable.

Respectfully submitted.

VOLPE AND KOENIG, P.C.

Date: September 25, 2009

By: /s/ Kristine L. Butler  
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**CERTIFICATION PURSUANT TO L. CIV. R. 11.2**

Pursuant to Local Civil Rule 11.2, I hereby certify that the matter in controversy is the subject of other actions:

Lottotron, Inc. v. Morris Mohawk Gaming Group, D.N.J. 3:05-cv-4562
Lottotron, Inc. v. CWC Ltd., D.N.J. 2:09-cv-04655
Lottotron, Inc. v. GTech Corp, D.N.J. 3:05-cv-4562 (closed)
Lottotron, Inc. v. Rational Poker School, Ltd., d/b/a Pokerstars, D.N.J. 2:08-cv-04874 (closed)

Respectfully submitted.

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